

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Accessibility of User Interfaces, and Video	)	MB Docket No. 12-108
Programming Guides and Menus	)	

**COMMENTS OF THE  
ALLIANCE FOR COMMUNITY MEDIA**

Sylvia L. Strobel, Esq.  
Executive Director  
Alliance for Community Media  
1760 Old Meadow Road, Suite 500  
McLean, VA 22012  
(703) 506-2889

July 15, 2013

The Alliance for Community Media (ACM) submits these comments in response to *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus*, MB Docket No. 12-108, Notice of Proposed Rulemaking, FCC 13-77 (rel. May 30, 2013) (“NPRM”).

The ACM files these comments in support of its members: the non-commercial public, educational and governmental cable channels – community media centers -- located throughout the United States. These local, non-commercial community media centers bring unique voices, perspectives and programming to communities. Local school districts operate educational channels (the “E” in PEG) to feature school board meetings and forums, homework helpers, interviews, lectures and sporting events not otherwise available by television broadcast. Local governments (the “G” in PEG) connect residents to city council meetings and provide informative, civic information in much the same way that C-SPAN covers Washington DC. The public (“P” in PEG) provides the public with access to community content producers who create news, information, documentaries and educational programming for and about the local community to meet local needs.

Many of our members carry programming on their channels which includes closed captioning. Our members have program description and accessibility information readily available for many programs with accessibility options such as closed captions. Unfortunately, the onscreen video programming guide of many of our members’ multichannel video programming distributor(s) (MVPD) does not provide a label or symbol indicating that these programs have closed captions. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the MVPD’s video programming guide what our

members' programs are and whether their programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

Of particular concern are our members served by AT&T's U-verse multichannel video service, which has created unique and especially difficult problems for visually-impaired viewers wishing to view PEG channel programming. Unlike the linear PEG channels on other incumbent cable operator's system, which the visually impaired can reach simply by remembering the right channel number, with AT&T's PEG product the visually impaired must somehow, after punching in channel 99, figure out how to visually navigate a series of menus and sub-menus just to reach any of our PEG channels. The more PEG channels in the DMA and the more PEG channels in each jurisdiction, the more sub-menus the visually impaired must somehow figure out how to "see" and navigate. Moreover, AT&T PEG product's lack of a truly effective "last channel" function for PEG creates yet more problems for the visually impaired if they wish to go to or from a PEG channel from or to a non-PEG channel to another. In short, the visually impaired are genuinely, and dramatically, disadvantaged compared to the non-visually impaired in accessing, and being able to have the same functionality with respect to, our members' PEG channels on AT&T's U-verse system.

We urge the Commission to (i) require AT&T to provide its U-verse subscribers with access and functionality to PEG programming that is equivalent to that which it provides to linear commercial programming channels on its system; and (ii) provided that PEG programmers furnish such information to cable operators, the Commission should require that cable operators provide in their electronic programming guides' programming description information on PEG programming equivalent to the program description information, including closed captioning

notification and capability, that cable operators make available in their EPGs to other programming channels.

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sylvia L. Strobel', with a stylized, cursive script.

Sylvia L. Strobel, Esq.

Executive Director

Alliance for Community Media

1760 Old Meadow Road, Suite 500

McLean, VA 22012

(703) 506-2889